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August 19, 2021

Hon. Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Peter Rodriguez v. City of New York, et al.
20 CV 9840 (GHW)

Your Honor:

Defendants write in response to the Court's Order of August 16, 2021 requesting defendants' position on plaintiff's request for either a stay of the case or an extension of the current discovery deadlines.

Defendants have no objection to either a stay or an extension of the discovery deadlines in this case. However, defendants note that plaintiff's claim that law library services have "ceased" on Rikers Island during the COVID-19 pandemic is not correct. Since the beginning of the pandemic, inmates have been able to order whatever research materials they require from the law library to be delivered to their cells. In addition, since October 2020, inmates have been allowed to go to the physical law library for limited purposes as long as sufficient library staff is available. There would therefore appear to be no institutionally imposed impediment to plaintiff completing his responses to defendants' discovery requests. Regardless, defendants do not object to plaintiff's request for an extension of time.

Thank you for your consideration herein.

Respectfully submitted,

/s/ *Katherine J. Weall*

Katherine J. Weall
Senior Counsel

cc: Peter Rodriguez (via U.S Mail)